

1
2
3
4
5
6
7
8 UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 DOUG BRIGGS, individually and as
11 Personal Representative of THE
ESTATE OF BARBARA DREYFUSS,

12 Plaintiff,

13 v.

14 LIFE CARE CENTERS OF
15 AMERICA, INC., LAKE VUE
OPERATIONS, LLC,

16 Defendants.

17 DARCY KOVACS, individually and as
18 Personal Representative of THE
ESTATE OF ROBIN HAMRICK,

19 Plaintiff,

20 v.

21 LIFE CARE CENTERS OF
22 AMERICA, INC., LAKE VUE
OPERATIONS, LLC,

23 Defendants.
24

CASE NO. C21-740 MJP

VERDICT FORM

VERDICT FORM

We the jury, provide the following answers to the questions submitted by the Court:

Question No. 1: Has Plaintiff Doug Briggs as the personal representative of the Estate of Barbara Dreyfuss proved his claim that Defendants engaged in negligence (First Cause of Action)?

Answer: NO (Yes or No)

If you answered "Yes" to Question No. 1, please answer Question No. 2. If you answered "No" to Question No. 1, please skip to Question No. 4.

Question No. 2: Has Plaintiff Doug Briggs as the personal representative of the Estate of Barbara Dreyfuss proved that Barbara Dreyfuss suffered damages proximately caused by Defendants' negligence?

Answer: _____ (Yes or No)

After you answer Question No. 2, please answer Question No. 3.

Question No. 3: Has Plaintiff Doug Briggs as the personal representative of the Estate of Barbara Dreyfuss proved that Doug Briggs suffered damages proximately caused by Defendants' negligence?

Answer: _____ (Yes or No)

After you answer Question No. 3, please answer Question No. 4.

1 **Question No. 4:** Has Plaintiff Darcy Kovacs as the personal representative of the Estate
2 of Robin Hamrick proved her claim that Defendants engaged in negligence (First Cause of
3 Action)?

4 Answer: Yes (Yes or No)

5
6 *If you answered "Yes" to Question No. 4, please answer Question No. 5. If you answered*
7 *"No" to Question No. 4, please skip to Question No. 7.*

8
9 **Question No. 5:** Has Plaintiff Darcy Kovacs as the personal representative of the Estate
10 of Robin Hamrick proved that Robin Hamrick suffered damages proximately caused by
11 Defendants' negligence?

12 Answer: NO (Yes or No)

13
14 *After you answer Question No. 5, please answer Question No. 6.*

15
16 **Question No. 6:** Has Plaintiff Darcy Kovacs as the personal representative of the Estate
17 of Robin Hamrick proved that Darcy Kovacs suffered damages proximately caused by
18 Defendants' negligence?

19 Answer: NO (Yes or No)

20
21 *After you answer Question No. 6, please answer Question No. 7.*
22
23
24

1 **Question No. 7:** Has Plaintiff Doug Briggs as the personal representative of the Estate of
2 Barbara Dreyfuss proved his claim that Defendants engaged in “neglect” under the Abuse of
3 Vulnerable Adults Act (Second Cause of Action)?

4 **Answer:** No (Yes or No)

5
6 *If you answered “Yes” to Question No. 7, please answer Question No. 8. If you answered*
7 *“No” to Question No. 7, please skip to Question No. 9.*

8
9 **Question No. 8:** Has Plaintiff Doug Briggs as the personal representative of the Estate of
10 Barbara Dreyfuss proved that Barbara Dreyfuss suffered damages proximately caused by
11 Defendants’ “neglect”?

12 **Answer:** No (Yes or No)

13
14 *After you answer Question No. 8, please answer Question No. 9.*

15
16 **Question No. 9:** Has Plaintiff Darcy Kovacs as the personal representative of the Estate
17 of Robin Hamrick proved her claim that Defendants engaged in “neglect” under the Abuse of
18 Vulnerable Adults Act (Second Cause of Action)?

19 **Answer:** No (Yes or No)

20
21 *If you answered “Yes” to Question No. 9, please answer Question No. 10. If you*
22 *answered “No” to Question No. 9, please skip to Question No. 11.*

Question No. 10: Has Plaintiff Darcy Kovacs as the personal representative of the Estate of Robin Hamrick proved that Robin Hamrick suffered damages proximately caused by Defendants' "neglect"?

Answer: _____ (Yes or No)

After you answer Question No. 10, please answer Question No. 11.

Question No. 11: If you answered "Yes" to Question Number 2, and/or Question Number 8, what are the amount of damages sustained by:

Barbara Dreyfuss: **Answer:** _____ (enter amount)

Please answer Question No. 12.

Question No. 12: If you answered "Yes" to Question Number 3, what are the amount of damages sustained by:

Doug Briggs: **Answer:** _____ (enter amount)

Please answer Question No. 13.

Question No. 13: If you answered "Yes" to Question Number 5, what are the amount of damages sustained by:

Robin Hamrick: **Answer:** _____ (enter amount)

1 Please answer Question No. 14.

2
3 **Question No. 14:** If you answered "Yes" to Question Number 6, what are the amount of
4 damages sustained by:

5 Darcy Kovacs: **Answer:** _____ (enter amount)

6
7 *Presiding Juror, please sign and date this Verdict Form*

8
9 Date: 5/19/23

Sign: 

Presiding Juror